

ROTTENBERG LIPMAN RICH, P.C.

NEW JERSEY OFFICE
PARK 80 WEST, PLAZA ONE
250 PEHLE AVENUE, SUITE 601
SADDLE BROOK, NEW JERSEY 07663
TELEPHONE (201) 490-2022
TELECOPIER (201) 490-2040

THE HELMSLEY BUILDING
230 PARK AVENUE
EIGHTEENTH FLOOR
NEW YORK, NEW YORK 10169
TELEPHONE (212) 661-3080
TELECOPIER (212) 867-1914

WWW.RLRPCLAW.COM
BERTRAND C. SELLIER
MEMBER
BSELLIER@RLRPCLAW.COM

December 20, 2021

BY ECF & EMAIL:

Hon. John P. Cronan
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Courtroom 12D
New York, New York 10007
CronanNYSDChambers@nysd.uscourts.gov

The request is granted. Fact discovery shall close on March 7, 2022, expert discovery shall close on April 21, 2022, and the parties shall file the joint post-discovery status letter by April 28, 2022.

SO ORDERED.

Date: December 24, 2021

New York, New York



Re: Alex Goldfarb v. Channel One Russia
Index No.: 18-cv-08128 (JPC)

JOHN P. CRONAN
United States District Judge

Dear Judge Cronan:

I am writing on behalf of both parties to follow up on the issues raised at the December 8, 2021 conference. TransPerfect, a respected translation and court reporting firm, has reconsidered its position and will provide its services for the remote depositions in Moscow. The parties have agreed, subject of course to Your Honor's approval, to a 60-day extension of the existing deadline for fact discovery and a corresponding extension of the subsequent deadlines. In light of the foregoing, the parties respectfully submit that the remaining items discussed in the conference and the Court's Minute Entry are moot.

Thank you for your attention to this matter and best wishes for the holidays.

Respectfully,



Bertrand C. Sellier

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cc: Kendall E. Wangsgard, Esq. (via ECF and email)